

**M IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JESSICA JONES, et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC, et al.

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

JURY DEMAND

**DECLARATION OF DAVID SEIDEL IN SUPPORT OF PLAINTIFFS' MOTION TO
UNSEAL COURT RECORDS**

DECLARATION OF DAVID SEIDEL

I, David Seidel , declare the following under penalty of perjury:

1. I am an attorney at the Joseph Saveri Law Firm, LLP, counsel for Plaintiffs Jessica Jones and Christina Lorenzen (collectively, “Plaintiffs”). I am a member in good standing of the State Bar of California and have been admitted *pro hac vice* in the United States District Court for the Western District of Tennessee, Western Division. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would testify competently to them. I write this declaration in support of Plaintiffs’ Motion to Unseal Court Records (“Motion”).

2. On April 8, 2021, the parties in the above-captioned litigation filed a stipulated Protective Order with the Court. ECF No. 62. The Protective Order enabled the parties to designate materials produced in the action as Confidential or Highly Confidential.

3. Defendants collectively produced approximately 252,189 documents during discovery. Defendants designated virtually all of these documents as Confidential or Highly Confidential under the Protective Order. As a result of Defendants blanket designations, the parties have had to file under seal all papers and exhibits that constitute or quote Defendants’ documents. Defendants’ documents make up the vast majority of the evidence in this case.

4. Attached hereto as **Exhibit A** is a list of the papers and exhibits submitted under seal in relation to the following filings:

- Plaintiffs’ Plaintiffs’ Motion for Class Certification;
- Defendants’ Motions for Summary Judgment;
- Defendants’ Motions to Exclude Plaintiffs’ Experts; and
- Plaintiffs’ Motion to Exclude Portions of Defendants’ Experts.

5. Attached hereto as **Exhibit B** is a true and correct copy of a transcript of the deposition of Plaintiff Christina Lorenzen. Portions of the transcript have been highlighted under my direction to show proposed redactions to protect personally identifiable information, the identities of minor children, or other sensitive personal information pursuant to Rule 5.2(a) of the Federal Rules of Civil Procedure and section 13.4.2 and 13.4.3 of the Western District of Tennessee's Electronic Case Filing (ECF) Policies & Procedures.

6. Attached hereto as **Exhibit C** is a true and correct copy of a transcript of the deposition of Plaintiff Jessica Jones. Portions of the transcript have been highlighted under my direction to show proposed redactions to protect personally identifiable information, the identities of minor children, or other sensitive personal information pursuant to Rule 5.2(a) of the Federal Rules of Civil Procedure and section 13.4.2 and 13.4.3 of the Western District of Tennessee's Electronic Case Filing (ECF) Policies & Procedures.

7. I met and conferred with counsel for all Defendants several times, both telephonically and through email correspondence, including phone calls on October 3, and October 18, 2023. The parties were unable to come to any agreement on how to resolve the issue of unsealing the records without a motion. Defendants oppose unsealing the records.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 21, 2023 in San Francisco, California.

/s/ David Seidel
David Seidel